

Joseph R. Saveri (admitted *pro hac vice*)
Joshua P. Davis (admitted *pro hac vice*)
Kevin E. Rayhill (admitted *pro hac vice*)
Jiamin Chen (admitted *pro hac vice*)
JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
San Francisco, California 94108
Phone: (415) 500-6800
Fax: (415) 395-9940
jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
krayhill@saverilawfirm.com
jchen@saverilawfirm.com

*Co-Lead Counsel for the Classes and
Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT ZUFFA,
LLC'S MOTION TO SEAL ZUFFA,
LLC'S MOTION FOR SUMMARY
JUDGMENT AND RELATED
MATERIALS (ECF NO. 577)**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc., Co-Lead Counsel for the Classes
3 and Attorneys for Individual and Representative Plaintiffs. I am a member in good standing of the State
4 Bar of California, and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have
5 personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would
6 testify competently to them.

7 2. I make this Declaration in support of Plaintiffs' Opposition to Defendant Zuffa, LLC's
8 Motion to Seal Defendant Zuffa, LLC's Motion for Summary Judgment and Related Materials (the
9 "Opposition").

10 3. Attached hereto as Exhibit 1 is a chart I created entitled "Zuffa's Requests to Seal and
11 Plaintiffs' Arguments Against." Has five sections corresponding to the five categories of documents
12 Zuffa asks the Court to seal in its Motion to Seal Zuffa, LLC's Motion for Summary Judgment and
13 Related Materials (ECF No. 577) (the "Motion to Seal"): Contracts ("Table A"), Financial Information
14 ("Table B"), Business Communication and Strategy ("Table C"), Third Party Information ("Table
15 D"), and Expert Reports and Testimony ("Table E"). Exhibit 1 contains three columns. The first
16 column is entitled "Document" and lists the materials Zuffa asks the Court to seal. These entries are
17 taken directly from Zuffa's Motion to Seal. The second column is entitled "Description" and contains
18 brief summaries I created of the content of the materials Zuffa asks the Court to seal. The third column
19 is entitled "Argument Against" and contains brief statements of why Plaintiffs believe the materials
20 should not be sealed (with the exception of some documents in the Third Party Information section,
21 which Plaintiffs have indicated they do not oppose sealing).

22 4. Attached hereto as Exhibit 2 is a true and correct copy of an article written by Adam
23 Swift, entitled "Inside the Standard Zuffa Contract," and published on the Sherdog.com website on
24 Oct. 31, 2007. This article was downloaded from the internet at my direction on August 10, 2018, and is
25 available for download at [http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-](http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-9734)
26 [9734](http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-9734).

27 5. Attached hereto as Exhibit 3 is a true and correct copy of an article entitled "The
28 Business of Fighting: A Look Inside the UFC's Top-Secret Fighter Contract." The article was written

1 by Jonathan Snowden and was published on the Bleacher Report website on May 14, 2013. The article
2 was downloaded at my direction on August 10, 2018, and is available for download at
3 [https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-](https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-fighter-contract#slide8)
4 [fighter-contract#slide8](https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-fighter-contract#slide8).

5 6. Attached hereto as Exhibit 4 is a true and correct copy of an article entitled, “Bellator
6 agrees to terms with Gilbert Melendez, UFC holds right to match.” The article was written by Shaun
7 El-Shatti, and was published on the MMAFighting.com website on February 14, 2014. The article was
8 downloaded at my direction on August 10, 2018, and is available for download at
9 [https://www.mmafighting.com/2014/2/14/5412944/bellator-agrees-to-terms-with-gilbert-melendez-](https://www.mmafighting.com/2014/2/14/5412944/bellator-agrees-to-terms-with-gilbert-melendez-ufc-holds-right-to)
10 [ufc-holds-right-to](https://www.mmafighting.com/2014/2/14/5412944/bellator-agrees-to-terms-with-gilbert-melendez-ufc-holds-right-to).

11 7. Attached hereto as Exhibit 5 is a true and correct copy of an article entitled “Are UFC
12 Contracts, Like a Diamond, Forever?” The article was written by EMagraken and was published on the
13 Combat Sports Law website on September 28, 2015. The article was downloaded at my direction on
14 August 10, 2018, and is available for download at [https://combatsportslaw.com/2015/09/28/are-ufc-](https://combatsportslaw.com/2015/09/28/are-ufc-contracts-like-a-diamond-forever/)
15 [contracts-like-a-diamond-forever/](https://combatsportslaw.com/2015/09/28/are-ufc-contracts-like-a-diamond-forever/).

16 8. Attached hereto as Exhibit 6 is a true and correct copy of an internet forum chat entitled
17 “Serious question. When signing to challenge for the belt....” The string was begun on June 25, 2018
18 and published on the Sherdog website. It was downloaded at my direction on August 10, 2018, and is
19 available for download at [http://forums.sherdog.com/threads/serious-question-when-signing-to-](http://forums.sherdog.com/threads/serious-question-when-signing-to-challenge-for-the-belt.3786659/)
20 [challenge-for-the-belt.3786659/](http://forums.sherdog.com/threads/serious-question-when-signing-to-challenge-for-the-belt.3786659/).

21 9. Attached hereto as Exhibit 7 is a true and correct copy of an email from John Nash to the
22 Court. The email was sent on June 3, 2018, and has the subject line, “Request to Unseal Court
23 Records.”

24 10. Attached hereto as Exhibit 8 is a true and correct copy of a letter from John Nash to the
25 Court. The letter was attached to an email Mr. Nash sent to the Court on June 15, 2018.

26 11. Attached hereto as Exhibit 9 is a true and correct copy of an article entitled “UFC’s
27 Dana White: ‘Insane’ If You Don’t Worry About Competition.” The article was written by Paul Gift
28 and was published by Forbes.com on February 28, 2018. The article was downloaded at my direction on

1 June 18, 2018, and is available for download at

2 [https://www.forbes.com/sites/paulgift/2018/02/28/ufcs-dana-white-insane-if-you-dont-worry-about-](https://www.forbes.com/sites/paulgift/2018/02/28/ufcs-dana-white-insane-if-you-dont-worry-about-competition/#7c8d97876ab5)
3 [competition/#7c8d97876ab5](https://www.forbes.com/sites/paulgift/2018/02/28/ufcs-dana-white-insane-if-you-dont-worry-about-competition/#7c8d97876ab5).

4 12. Attached hereto as Exhibit 10 is a true and correct copy of an article entitled “UFC
5 Lawsuit: Expert for Plaintiffs sets damages at up to \$1.6 billion.” The article was written by John S.
6 Nash, and published on the Bloody Elbow.com website on Feb. 19, 2018. The article was downloaded at
7 my direction on August 8, 2018, and is available for download at

8 [https://www.bloodyelbow.com/2018/2/19/17023756/expert-plaintiffs-sets-damages-ufc-class-action-](https://www.bloodyelbow.com/2018/2/19/17023756/expert-plaintiffs-sets-damages-ufc-class-action-suit-up-to-1-6-billion)
9 [suit-up-to-1-6-billion](https://www.bloodyelbow.com/2018/2/19/17023756/expert-plaintiffs-sets-damages-ufc-class-action-suit-up-to-1-6-billion).

10 13.
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12 I declare under penalty of perjury and the laws of the United States that the foregoing is true and
13 correct and this Declaration is executed in San Francisco, California on August 13, 2018.

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15 By: /s/Kevin E. Rayhill
16 Kevin E. Rayhill
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